

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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CARLOS CONTRERAS,

2:25-cv-00418-NJC-AYS

Plaintiff,

-against-

POLAR PROPERTY SERVICES, INC.,  
JOHN A. ROMANELLI, and RICHARD  
P. SCULCO,

**NOTICE OF MOTION TO PARTIALLY  
DISMISS PLAINTIFF'S AMENDED  
COMPLAINT PURSUANT TO FED. R.  
CIV. P. 12(b)(6)**

Defendants.

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PLEASE TAKE NOTICE, that pursuant to Rules 12(b)(6) of the Federal Rules of Civil Procedure, and upon the reading of the Memorandum of Law in Support of Defendants' Motion to Partially Dismiss the Amended Complaint of Plaintiff, CARLOS CONTRERAS, Defendants, POLAR PROPERTY SERVICES, INC., JOHN A. ROMANELLI, and RICHARD P. SCULCO, by and through their attorneys, THE NHG LAW GROUP, P.C., will move this Court before the Honorable Nusrat J. Choudhury, U.S.D.J., United States District Court for the Eastern District of New York, located at 100 Federal Plaza, Central Islip, New York 11722, at the earliest date and time available to this Court so that counsel may be heard for an Order granting Defendants' Motion to Partially Dismiss Plaintiff's Amended Complaint with prejudice.

This Motion is based on Defendants' accompanying Memorandum of Law in Support, the Declaration of Keith E. Williams, Esq. in Support, and the Exhibits attached thereto.

Dated: Massapequa, New York  
September 22, 2025

The NHG Law Group, P.C.



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